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STATE OF CALIFORNIA—HEALTH AND HUMAN SERVICES AGENCY
DEPARTMENT OF SOCIAL SERVICES
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EDMUND G. BROWN JR.
GOVERNOR

April 11, 2012

Sheryl L. Spiller, Acting Director
Los Angeles County Department of Public Social Services
12860 Crossroads Parkway South
City of Industry, CA 91746

Dear Ms. Spiller:

Subject: Corrected letter with enclosure

Thank you for submitting your agency's Corrective Action Plan (CAP) of November 17, 2011, this responds to our Civil Rights Compliance Review Of May 23-27, 2011. At this time, we are partially approving your CAP.

The portions dealing with Exposition Park Office #12; 3833 S. Vermont, Los Angeles, on pg. 1 Items 1 and 2; pg.4 Items 10, and 11 and pg.5 Items 14 through 16, pg. 6 Items 19 through 25 are approved. We thank you for your continued efforts to ensure non-discrimination in our programs.

However, we are not approving your response to the following items: pg. 3 Item 3, 7, 8, and 9, pg. 4, 5 Item 12 and 13, pg. 6 Item 17 and 18 of your CAP.

Please provide the statutory base that supports your response in your Corrective Action Plan stating: "According to the Los Angeles County CEO, modification to the building is not required due to the code was met at the time the County acquired the facility" (in the page 3,4, 5, and 6 mentioned of your CAP).

Facilities constructed before July, 1, 1970 must have been made accessible when any alterations, structural repairs, or additions were made. Please provide our office the last date(s) you had refurbished, remodeled or had any reconstructions made at the following facilities:

- Exposition Park #12, 3833 S. Vermont Ave., Los Angeles, CA
- South Central Office #27, 10728 S. Central Ave, Los Angeles, CA

It was also stated, that in addition, it is cost prohibitive at this time. If you wish to claim a financial hardship, please provide further detailed explanation to justify why you believe it falls under financial hardship, including an estimate of how much it will cost to remedy each citation.

Please submit your additional information addressing the above deficiency (ies) to our office by May 11, 2012. Upon receipt of the requested revisions/information, our office will reconsider approval of the Corrective Action Plan. In the mean time, we will continue to consider the buildings out of compliance.

If you have any questions, please contact Elsa Garcia at (916) 654-2107. You may also contact us by e-mail at crb@dss.ca.gov.

Sincerely,



JIM TASHIMA, Chief
Civil Rights Bureau
Human Rights and Community Services Division

Enclosure

c. Gloria Easley, Civil Rights Coordinator
Joan Reyes, Audit Liaison Manager

Linda Patterson, Branch Chief
CDSS CalFresh Program

Mike Papin, Chief
CalFresh Policy Bureau

Marlene Fleming, Chief
Field Operations Bureau

Brian Tam, Chief
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Acting Director

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November 17, 2011

Jim Tashima, Chief
Civil Rights Bureau
California Department of Social Services
744 P Street, MS 8-16-70
Sacramento, CA 95814

Dear Mr. Tashima:

**CIVIL RIGHTS COMPLIANCE REVIEW CONDUCTED MAY 23 - 27, 2011 FOR
LOS ANGELES COUNTY DEPARTMENT OF PUBLIC SOCIAL SERVICES**

Enclosed is the Los Angeles County Department of Public Social Services (DPSS) report on implementation of corrective actions resulting from the 25 findings identified during the 2011 Civil Rights Compliance Review conducted by your staff on May 23-27, 2011.

DPSS has been actively working to implement all appropriate corrective actions identified in the final Civil Rights Compliance Review Report. Of the 25 corrective actions identified by the auditors, to date, 9 have been implemented; 1 is targeted for implementation by November 30, 2011; 6 are targeted for December 30, 2011; 2 are targeted for January 31, 2012; and 7 were deemed Not Applicable.

If you have any questions, please let me know, or your staff may contact Sheri Lewis at (562) 908-5879.

Sincerely,

Sheryl L. Spiller
Acting Director

SLS:lb

Enclosure

CDSS CIVIL RIGHTS COMPLIANCE REVIEW 2011

DPSS RESPONSE TO
FINDINGS AND CORRECTIVE ACTIONS

I. FACILITY ACCESSIBILITY FOR INDIVIDUALS WITH DISABILITIES

POMONA IHSS OFFICE #19, 360 E. Mission Blvd., Pomona, CA

FACILITY ELEMENT: PARKING

FINDINGS:

1. *No "Minimum Fine \$250" signage below the ISA sign.*

CORRECTIVE ACTION:

For both posted and wall-mounted signage, additional language on symbol sign and an additional sign below the symbol sign shall state "Minimum Fine \$250.00." (CA T24 1129B.4.1) p 133

DPSS RESPONSE:

DPSS is working with the Los Angeles County Internal Services Department (ISD) to post the "Minimum Fine \$250" signage.

Target Date: November 30, 2011

2. *Lengths of accessible spaces are too short at 16'7".*

CORRECTIVE ACTION:

Length of parking space shall be at least 18' long, 9' wide. (CA T24 1129B.3.1, ADA 4.6.3) p 135

DPSS RESPONSE:

The owner of the facility will change the length of the parking space to 18' long, 9' wide.

Target Date: January 31, 2012

3. *Access aisle is short in length at 4'9".*

CORRECTIVE ACTION:

Access aisles should be located on the passenger side of a space, and should be a min. of 18' long by 5" wide for aisles, serving car accessible spaces, and a min. 18' by 8' wide for aisles serving van accessible spaces. (CA T24 1129B.3.1) (ADA 4.6.3)

DPSS RESPONSE:

The owner of the facility will change the access isles to the correct length to ensure full compliance.

Target Date: January 31, 2012

POMONA IHSS OFFICE #19, 360 E. Mission Blvd., Pomona, CA (Continued)

FACILITY ELEMENT: MEN'S RESTROOM

FINDING:

4. *Force to open door is excessive at 10 lbs.*

CORRECTIVE ACTION:

Force to open doors, exterior and interior is 5 pounds maximum. (CA T24 1133B.2.5, ADA 4.1 3.11 (2)(a) & (b)) p 207

DPSS RESPONSE:

The door pressure for the men's restroom at the Pomona IHSS Office was corrected to 5 pounds.

Completed: May 19, 2011

FACILITY ELEMENT: WOMEN'S RESTROOM

FINDING:

5. *Force to open door is excessive at 10 lbs.*

CORRECTIVE ACTION:

Force to open doors, exterior and interior is 5 pounds maximum. (CA T24 1133B.2.5, ADA 4.1 3.11 (2)(a) & (b)) p 207

DPSS RESPONSE:

The door pressure for the women's restroom at the Pomona IHSS Office was corrected to 5 pounds.

Completed: May 19, 2011

EXPOSITION PARK OFFICE #12, 3833 S. Vermont Ave., Los Angeles, CA

FACILITY ELEMENT: PARKING

FINDINGS:

6. *No "Minimum Fine \$250" signage below the ISA sign for each parking space in Parking Garage.*

CORRECTIVE ACTION:

For both posted and wall-mounted signage, additional language on symbol sign and an additional sign below the symbol sign shall state "Minimum Fine \$250.00." (CA T24 1129B.4.1) p 133

DPSS RESPONSE:

On November 10, 2011, the owner of the facility agreed to correct both posted and wall-mounted signage to display "Minimum Fine \$250" below the ISA sign for each parking space in Parking Garage.

Target Date: December 30, 2011

EXPOSITION PARK OFFICE #12, 3833 S. Vermont Ave., Los Angeles, CA (Continued)

7. **Total of twelve accessible spaces, six on the left side by the elevator and six opposite of the elevator. The six on the left side of the elevator meet the accessible parking space measurements (18 x 9).**

CORRECTIVE ACTION:

Length of parking space shall be at least 18' long, 9' wide. (CA T24 1129B.3.1, ADA 4.6.3) p 135

DPSS RESPONSE:

According to the Los Angeles County Chief Executive Office (CEO), modification to the parking facility is not required because the code was met at the time the County acquired the facility. In addition, it is cost prohibitive at this time. Corrective action is not required.

Target Date: Not Applicable

8. **The six access aisle spaces on the left side of the elevator do not meet the access aisle measurement requirement at 4'9.**

CORRECTIVE ACTION:

Access aisles should be located on the passenger side of a space, and should be a min. of 18' long by 5" wide for aisles, serving car accessible spaces, and a min. 18' by 8' wide for aisles serving van accessible spaces. (CA T24 1129B.3.1) (ADA 4.6.3)

DPSS RESPONSE:

According to the Los Angeles County CEO, modification to the parking facility is not required because the code was met at the time the County acquired the facility. In addition, it is cost prohibitive at this time. Corrective action is not required.

Target Date: Not Applicable

9. **There are six spaces opposite of the elevator. Only one of the spaces located as the fourth space from left to right meets Length meas. of 18'. The spaces varied in lengths:**

- #1 16'6 1/2L,
- #2 16'6 L
- #3 16'7 L
- #4 18 L
- #5 17'10 1/2
- #6 16'4 1/2

CORRECTIVE ACTION:

Length of parking space shall be at least 18' long, 9' wide. (CA T24 1129B.3.1, ADA 4.6.3) p 135

DPSS RESPONSE:

According to the Los Angeles County CEO, modification to the parking facility is not required because the code was met at the time the County acquired the facility. In addition, it is cost prohibitive at this time. Corrective action is not required.

Target Date: Not Applicable

EXPOSITION PARK OFFICE #12, 3833 S. Vermont Ave., Los Angeles, CA (Continued)

FACILITY ELEMENT: EXTERIOR ENTRANCE INTO LOBBY FROM PARKING GARAGE

FINDINGS:

10. Force to open door is excessive at 20 lbs.

CORRECTIVE ACTION:

Force to open doors, exterior and interior is 5 pounds maximum. (CA T24 1133B.2.5, ADA 4.13.11(2) (a) & (b)) p 207

DPSS RESPONSE:

The owner of the facility will have the doors adjusted to 5 pounds.

Target Date: December 30, 2011

11. No directional signage to accessible main entrance lobby.

CORRECTIVE ACTION:

A sign with the international symbol of accessibility shall be at every primary entrance and every major junction indicating the direction along or to accessible features. (CA T24 1127B.3, ADA 4.1.3(169), CA T24 1117B.5.1) pp 186,394

DPSS RESPONSE:

The owner of the facility will provide additional directional signage accessible to the main entrance lobby.

Target Date: December 30, 2011

FACILITY ELEMENT: FRONT MAIN ENTRANCE

FINDINGS:

12. The ramp slope is too steep. It varied in measurements from 8.4% to 9.5%.

CORRECTIVE ACTION:

Slope of ramp does not exceed 1:12 (8.3% slope).(CA T24 1127B.5.3, ADA 4.8.2) p 155

DPSS RESPONSE:

According to the Los Angeles County CEO, modification to the building is not required because the code was met at the time the County acquired the facility. In addition, it is cost prohibitive at this time. Corrective action is not required.

Target Date: Not Applicable

13. The width of ramp is too narrow at 46".

CORRECTIVE ACTION:

The width of ramps is as required for stairways and exits. Pedestrian ramps have a minimum width of 48". (CA T24 1133B.5.2.) p 144

EXPOSITION PARK OFFICE #12, 3833 S. Vermont Ave., Los Angeles, CA (Continued)

DPSS RESPONSE:

According to the Los Angeles County CEO, modification to the building is not required because the code was met at the time the County acquired the facility. In addition, it is cost prohibitive at this time. Corrective action is not required.

Target Date: *Not Applicable*

14. Force to open main entrance door is excessive at 15 lbs.

CORRECTIVE ACTION:

Force to open doors, exterior and interior is 5 pounds maximum. (CA T24 1133B.2.5, ADA 4.13.11 (2)(a) & (b)) p 207

DPSS RESPONSE:

The owner of the facility will have the door pressure adjusted to 5 pounds maximum.

Target Date: *December 30, 2011*

FACILITY ELEMENT: 1st FLOOR, MEN'S RESTROOM

FINDING:

15. Force to open door is excessive at 18 lbs.

CORRECTIVE ACTION:

Force to open doors, exterior and interior is 5 pounds maximum. (CA T24 1133B.2.5, ADA 4.13.11 (2)(a) & (b)) p 207

DPSS RESPONSE:

The owner of the facility will have the door pressure adjusted to 5 pounds maximum.

Target Date: *December 30, 2011*

FACILITY ELEMENT: 1st FLOOR, WOMEN'S RESTROOM

FINDING:

16. Force to open door is excessive at 20 lbs.

CORRECTIVE ACTION:

Force to open doors, exterior and interior is 5 pounds maximum. (CA T24 1133B.2.5, ADA 4.13.11 (2)(a) & (b)) p 207

DPSS RESPONSE:

The owner of the facility will have the door pressure adjusted to 5 pounds maximum.

Target Date: *December 30, 2011*

SOUTH CENTRAL OFFICE #27, 10728 S. Central Ave., Los Angeles, CA

FACILITY ELEMENT: EXTERIOR ENTRANCE

FINDINGS:

- 17. There is a ramp leading to the building, and the second section of the ramp does not meet the measurement requirements; (slope varies between 8.4% - 9.6%).**

CORRECTIVE ACTION:

Slope of ramp does not exceed 1:12 (8.3% slope).(CA T24 1127B.5.3, ADA 4.8.2) p 155

DPSS RESPONSE:

According to the Los Angeles County CEO, modification to the building is not required because the code was met at the time the County acquired the facility. In addition, due to budgetary constraints, the County has no plans to undergo major construction. Corrective action is not required.

Target Date: Not Applicable

- 18. Ramp does not have railings on both sides. It is longer than 6'.**

CORRECTIVE ACTION:

If a ramp run has a rise greater than 6" or a horizontal project greater than 6', then it shall have handrails on both sides. (CA T24 1133B.5.5.1, ADA 4.8.5(1) p 146)

DPSS RESPONSE:

According to the Los Angeles County CEO, modification to the building is not required because the code was met at the time the County acquired the facility. In addition, due to budgetary constraints, the County has no plans to undergo major construction. Corrective action is not required.

Target Date: Not Applicable

FACILITY ELEMENT: PUBLIC TELEPHONE

FINDING:

- 19. The public telephone does not have volume control and hearing aid capability.**

CORRECTIVE ACTION:

At least one in each telephone bank and a minimum of 25% of the total number of public telephones shall be equipped with a volume control and shall be hearing aid compatible. (CA T24 1117B.2.8, ADA 4.1.3.17(b)) p 273

DPSS RESPONSE:

Corrective action to ensure the public telephone has the appropriate volume control and hearing aid capability was completed June 6, 2011.

Completed: June 6, 2011

SOUTH CENTRAL OFFICE #27, 10728 S. Central Ave., Los Angeles, CA (Continued)

FACILITY ELEMENT: MEN'S RESTROOM

FINDING:

20. Force to open door is excessive at 10 lbs.

CORRECTIVE ACTION:

Force to open doors, exterior and interior is 5 pounds maximum. (CA T24 1133B.2.5, ADA 4.13.11(2)(a) & (b)) p 207

DPSS RESPONSE:

The door pressure of the men's restroom at the South Central Office was corrected to 5 pounds.

Completed: May 24, 2011

FACILITY ELEMENT: WOMEN'S RESTROOM

FINDINGS:

21. Pipes under sink are not securely insulated.

CORRECTIVE ACTION:

Hot water and drain pipes are insulated or covered. No sharp or abrasive surfaces under lavatories. (CA T24 1115B.4.7.1, ADA 4.24.6) p 343

DPSS RESPONSE:

Los Angeles County ISD securely insulated the pipes located under the sink.

Completed: June 9, 2011

22. Paper towel dispenser is too high at 50".

CORRECTIVE ACTION:

If towel, sanitary napkins, waste receptacles, and other similar dispensing and disposal fixtures are provided, at least one of each type is located with all operable parts, including coin slots, at a maximum height of 40". (CA T24 1115B.8.3, ADA 4.23.7) p 294

DPSS RESPONSE:

DPSS submitted a Service Request to Los Angeles County ISD on May 3, 2011, to correct the height of the towel dispenser.

Completed: June 9, 2011

WILSHIRE SPECIAL OFFICE #10, 2415 W. 6th Street, Los Angeles, CA

FACILITY ELEMENT: EXTERIOR ENTRANCE

FINDING:

23. *In front of main entrance, the sidewalk is obstructed with uneven walkway.*

CORRECTIVE ACTION:

Walks and sidewalks subject to these regulations shall have a continuous surface, not interrupted by steps or by abrupt changes in level exceeding ½ inch and shall be a minimum of 48" in width. Surfaces shall be slip resistant. (CA T24 1133B.7.1, ADA 4.3.8) p 163

DPSS RESPONSE:

The sidewalk surface in front of the District Office entrance has been evenly leveled to have a continuous surface.

Completed: July 15, 2011

II. DISCRIMINATION COMPLAINT PROCEDURES

AREA OF FINDING: DISCRIMINATION PROCESS

Can the employees easily identify the difference between a program, discrimination, and a personnel complaint?

FINDING:

24. *Two of the staff interviewed could not differentiate between the different complaints.*

CORRECTIVE ACTION:

LADPSS shall ensure staff have knowledge of the discrimination complaint process and are able to differentiate it from other complaint processes. Div. 21-117 and 21-203

DPSS RESPONSE:

On August 23, 2011, the Department's Civil Rights Section conducted the Annual Civil Rights Liaison Meeting for all District Office Liaisons. This meeting included training on the discrimination complaint process as differentiated from other complaint processes (e.g., program, employee relations, customer service, etc.). Subsequent to the August 23, 2011 meeting, the District Office Liaisons were required to conduct training for district staff.

Completed: August 23, 2011

II. DISCRIMINATION COMPLAINT PROCEDURES (Continued)

AREA OF FINDING: CIVIL RIGHTS COORDINATOR

Did the employees know the location of the Civil Rights poster showing where the clients can file a discrimination complaint?

FINDING:

25. Two of the staff members interviewed did not know the location of required poster.

CORRECTIVE ACTION:

LADPSS shall ensure that staff is knowledgeable regarding contact information of the civil rights coordinator, at minimum, where the information can be located. Div. 21-117 and 21-107.21

DPSS RESPONSE:

On August 23, 2011, the Department's Civil Rights Section conducted the Annual Civil Rights Liaison Meeting for all District Office Liaisons. During this meeting, Civil Rights staff explained the requirement relating to the accessibility and location of the departmental Civil Rights Coordinator contact information that is required to be available in all public contact lobbies. The District Office Liaisons were further instructed that all public contact staff must have knowledge of the location of the required civil rights posters. Subsequent to the August 23, 2011 meeting, the District Office Liaisons were required to conduct training for district staff.

Completed: August 23, 2011